

BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations)	
Company for Authority to Implement Rate Adjustments)	
Required by 4 CSR 240-20.090(4) and the Company's)	Case No. EO-2008-0216
Approved Fuel and Purchased Power Cost Recovery)	
Mechanism.)	

**MOTION TO STRIKE OR, IN THE ALTERNATIVE,
TO FILE PROPOSED FINDINGS OF FACT**

KCP&L Greater Missouri Operations Company ("GMO" or "Company"), pursuant to 4 CSR 240-2.080(7) and Missouri Rule of Civil Procedure 55.27(e), moves to strike the Proposed Findings of Fact of the Industrial Intervenors as improper. In the alternative, the Company requests that it, and the other parties to this proceeding, be permitted to file proposed findings of fact and conclusions of law.

In support of this motion and alternative request, GMO states as follows:

1. The procedural schedule, proposed by the parties and adopted by the Commission on January 24, 2011, provided that the parties would file Initial Post-hearing Briefs on June 3, 2011 and Final Briefs on June 17, 2011. The procedural schedule did not call for the filing of proposed findings of fact.

2. On June 17, 2011, the Industrial Intervenors filed Proposed Findings of Fact. This is improper because such a filing was not called for by the procedural schedule and because no other parties had the opportunity to file proposed findings of fact.

3. Because the procedural schedule did not call for the filing of proposed findings of fact and because no other party has had the opportunity to file proposed findings of fact, the Commission should strike the Proposed Findings of Fact of the Industrial Intervenors.

4. In the alternative, the Commission should allow GMO and the other parties the opportunity to file proposed findings of fact.

WHEREFORE, the Company requests that this Motion to Strike be granted or, in the alternative, that the parties to this proceeding be permitted to file proposed findings of fact no later than June 24, 2011.

Respectfully submitted,

/s/ Karl Zobrist

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ATTORNEYS FOR KCP&L GREATER
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Certificate of Service

I hereby certify that on this 20th day of June, 2011 copies of the foregoing have been mailed, transmitted by facsimile, or emailed to all counsel of record.

/s/ Karl Zobrist

Attorney for KCP&L Greater Missouri Operations
Company